

U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NY (White Plains)

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JAN 19 2024
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN KUHL

: INDEX: 19-cv-8403

Plaintiff

v.

U.S. BANK TRUST NATIONAL
ASSOCIATION, NOT IN ITS INDIVIDUAL
CAPACITY BUT SOLELY AS OWNER
TRUSTEE FOR LEGACY MORTGAGE
ASSET TRUST 2018GS-1, MTGLQ
INVESTORS, LP and RUSHMORE LOAN
MANAGEMENT SERVICES LLC

Defendants

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PLAINTIFF'S DISCLOSURES PURSUANT TO FRCP 26

Pursuant to FRCP 26 (a), plaintiff Jonathan Kuhl hereby serves these initial disclosures to the defendants. These disclosures do not include the names of any potential experts retained or consulted. These disclosures do not constitute waiver or any work product protection and are without prejudice to any other issue or argument.

Identities of any persons who may have discoverable facts

Jonathan Kuhl, 115 Melanie Way, Hyde Park, N.Y.

Joseph Kuhl, 113 Elm St., Peekskill, N.Y.

Donald Rosendale, 4848 Route 44, Amenia, N.Y. 12501

Anthony Santiago, 115 Melanie Way, Hyde Park, N.Y.

Brian Barrett, 115 Melanie Way, Hyde Park, N.Y.

Nora Vazquez, 115 Melanie Way, Hyde Park, N.Y.

Description of documents, invoices and tangible things in plaintiff's possession
Relating to disputed facts described in the complaint

Various business plans and proposals for potential works projects available to Mr. Kuhl and/or Integrity Property Management during the period in which defendant wrongfully withheld insurance proceeds.

Tax returns for Integrity Property Management showing fall-off in income 2019 vs. 2020.

Invoices showing work completion dates and monies spent in repairing the subject workshop/garage.

Tables showing the dates requested and dates paid for insurance fund recovery.

Insurance agreement which would be available to pay damages

There is no insurance agreement which would compensate Mr. Kuhl for the lost income suffered by the withholding of insurance funds.

Plaintiff reserves the right to supplement this disclosure as additional information becomes available.

Jonathan Kuhl

Jonathan Kuhl, plaintiff *pro se* Dated: December 10, 2020

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Pro Se Elmer
U.S. District Court
300 Quarropas St.
White Plains, NY

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JAN 19 2021

